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10 LUCIO CHAGOLLA &  
11 MARIA D HERNANDEZ MURUETA

12 UNITED STATES BANKRUPTCY COURT  
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 IN RE: ) CHAPTER 13  
15 LUCIO CHAGOLLA )  
16 MARIA D HERNANDEZ MURUETA )  
17 Debtors. )  
18 )  
19 ) Honorable Stephen L. Johnson  
20 )  
21 )

22 **EX PARTE APPLICATION TO REOPEN CHAPTER 13 CASE**  
23 **PURSUANT TO 11 U.S.C. §350 AND BKRP 5010; MEMORANDUM OF**  
24 **POINTS AND AUTHORITIES IN SUPPORT THEREOF**

25 TO THE HONORABLE STEPHEN L. JOHNSON, U.S. BANKRUPTCY JUDGE,  
26 U.S. TRUSTEE, CHAPTER 13 TRUSTEE:

27 This Application will be based on this application and a declaration on the records file  
28 herein.

29 Applicants hereby request this court for an order reopening the above-referenced  
30 Chapter 13 proceeding pursuant to 11 U.S.C. §350 and BKRP 5010.

31 **MEMORANDUM OF POINTS AND AUTHORITIES**

32 The application is based upon the following facts and legal authorities:

33 1 Debtors filed for relief under Chapter 13 of the Bankruptcy Code, initiating the  
34 above-entitled case.

2. The case was closed and Debtors received a discharge.

3. Debtors are now attempting to have this Chapter 13 case reopened for the purpose of filing a Motion to Void and Strip Lien. This was regrettably not completed prior to the entry of Debtors' discharge.

4. 11 U.S.C. §350(b) provides that a case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtors, or for other cause. Federal Rules of Bankruptcy, Rule 5010, provides that, "[a] case may be reopened on motion of the debtor or other party in interest pursuant to §350(b) of the Code."

WHEREFORE, Debtors respectfully request an order reopening this case for the purpose of filing a Motion to Void and Strip Lien.

DATED: February 12, 2015

LAW OFFICES OF DAVID A. BOONE

By: /s/ Fanny Zhang Wan  
FANNY ZHANG WAN  
ATTORNEYS FOR DEBTORS